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June 18, 2019

## **VIA ECF**

The Honorable Deborah A. Batts United States District Judge Southern District of New York 500 Pearl Street, Room 2510 New York, New York 10007

Re: Fischler v. Magnum Real Estate Group LLC d/b/a 100 Barclay: Case No. 1:19-cv-02762-DAB

Dear Judge Batts:

We represent defendant Magnum Real Estate Group LLC d/b/a 100 Barclay ("Defendant") in the above-referenced matter. We respectfully move the Court to extends Defendant's deadline to answer, move, or otherwise respond to the plaintiff's complaint.

Pursuant to the enclosed stipulation, the parties have agreed to set July 26, 2019, as Defendant's deadline to move, answer, or otherwise respond to plaintiff's complaint. As Defendant's counsel has only recently been retained to represent it in this matter, this extension will permit Defendant's counsel to investigate and the parties to communicate regarding plaintiff's allegations. There have been no prior extensions in this matter.

Respectfully submitted,

Timothy J. Straub

Encl.

cc: Douglas Brian Lipsky, Esq. (counsel for Plaintiff) (by ECF)